

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL C. MAYO,)	
)	
Plaintiff,)	Case No.: 1:21-cv-04653
)	
v.)	Hon. Judge Robert M. Dow
)	
LARRY GAVIN, KAREN JONES-)	
HAYES, DAMITA DELITZ, BRENDAN)	
LOMBARDI, O. LOPEZ, E. PRESTON,)	
J. DELLIS, M. KIELIAN, AND JOHN)	
DOES 1-7,)	
Defendants.)	
)	
)	
)	

**AGREED MOTION FOR ENTRY OF
AGREED CONFIDENTIALITY ORDER**

NOW COME Defendants, LARRY GAVIN, DAMITA DELITZ, BRENDON LOMBARD, OSVALDO LOPEZ, ERROL PRESTON, JOHN DELLIS, AND MIROSLAW KIELIAN (collectively “Defendants”), by and through their attorneys Jason E. DeVore and Troy S. Radunsky of DeVore Radunsky LLC, and Plaintiff, MICHAEL C. MAYO (“Plaintiff”), by and through his attorneys Kirkland & Ellis LLP, and in support of this Agreed Motion for the Entry of the Agreed Confidentiality Order, the parties state the following:

1. The parties’ discovery responses in this case involve potentially confidential information, as well as potentially private, protected, personal information of nonparty individuals, including detainees.
2. Defendants’ counsel has conferred with Plaintiff, and the parties have agreed on the entry of the proposed Agreed Confidentiality Order attached to this motion as Exhibit “A.” The

proposed Agreed Confidentiality Order is also being emailed to the Court's designated email address for proposed orders.

WHEREFORE, Defendants, LARRY GAVIN, DAMITA DELITZ, BRENDON LOMBARD, OSVALDO LOPEZ, ERROL PRESTON, JOHN DELLIS, and MIROSLAW KIELIAN, by and through their attorneys DeVore Radunsky LLC, and Plaintiff, MICHAEL C. MAYO, by and through his attorneys Kirkland & Ellis LLP, respectfully request an order entered as follows:

1. The Agreed Motion for Entry of Agreed Confidentiality Order is granted;
2. The Agreed Confidentiality Order is entered;
3. Any further relief this Court deems appropriate.

Respectfully Submitted,

By: /s/ Jason E. DeVore
Attorney for Defendants

ARDC# 6242782
DeVore Radunsky LLC
27 N. Wacker, Suite 431
Chicago, Illinois 60606
jdevore@devoreradunsky.com

By: /s/ David J. Zott
David J. Zott, P.C.
Howard Michael Kaplan
Kirkland & Ellis LLP
300 N LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: dzott@kirkland.com
Email: howard.kaplan@kirkland.com

Attorneys for Plaintiff Michael C. Mayo

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on April 13, 2022, he electronically filed the foregoing document, which will send a notice of electronic filing to all counsel of record.

/s/ Jason E. DeVore _____
Jason E. DeVore